

**To:** FOSTER Eugene P[FOSTER.Eugene@deq.state.or.us]  
**Cc:** Henning, Alan[Henning.Alan@epa.gov]; Croxton, Dave[Croxton.David@epa.gov]; YON Donald R[YON.Donald@deq.state.or.us]; Fullagar, Jill[Fullagar.Jill@epa.gov]  
**From:** Carlin, Jayne  
**Sent:** Tue 7/7/2015 8:52:03 PM  
**Subject:** Question on 50% of FY14 319 Funds Going Towards Implementing Watershed Based Plans

Hi Gene:

I am helping Alan complete the checklist for the annual determination of progress on Oregon's NPS program. One of the questions asks:

Is the state implementing nine-element watershed-based plans – or approved alternative plans - at required grant expenditure levels in accordance with EPA's guidelines for CWA section 319(h) grants? Was 50% of the state's grant used to implement watershed based plans (unless the state provided state funding for watershed projects equal to its total section 319 allocation)?

I understand that usually most of the implementation of the plans is conducted by entities funded by ODEQ through its 319 grant program. In the 2014 annual report, ODEQ reported directing 36% of its 319 funds towards grants to conduct these projects. According to Dave Croxton, you told him that ODEQ plans to include FTE in the calculation of amount of funding used to implement watershed based plans and would be sending an email with the revised calculation. Do you have that information? Alternatively you can provide an explanation addressing the factors below to explain why Oregon could not meet the 50%.

You may want to consider requesting an interim waiver from the 50% for your upcoming 319 grant using FY15 319 funds via email to Alan & Jill. Justifications to demonstrate that waiver would:

- ☐ ☐ ☐ ☐ ☐ ☐ have less impact on a state's ability to deliver environmental results
- ☐ ☐ ☐ ☐ ☐ ☐ reduce impacts on state FTE, given the planning for that states have already done to date, and/or
- ☐ ☐ ☐ ☐ ☐ ☐ reduce a state's need to renege on commitments it has made to partners or stakeholders.

You should describe how your alternate proposal meets one or more of the above factors.

Thanks!

Jayne

Jayne Carlin, Watersheds Unit  
US EPA, Region 10  
1200 6th Ave, Suite 900 (OWW-134)  
Seattle, WA 98101-3140  
(206) 553-8512  
carlin.jayne@epa.gov

[www.epa.gov/r10earth/tmdl.htm](http://www.epa.gov/r10earth/tmdl.htm)

[yosemite.epa.gov/R10/ecocomm.nsf/Watershed+Collaboration/State+Tribal+NPS](http://yosemite.epa.gov/R10/ecocomm.nsf/Watershed+Collaboration/State+Tribal+NPS)